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*Attorneys for Debtor*

## *Attorneys for Debtor*

Orlando F. Cabanday, Jr.

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**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re ) Case No. 2:24-bk-10037-NB  
 )  
 ) Chapter 11  
 )  
 ) Debtor. ) **NOTICE OF HEARING ON FIRST  
 ) INTERIM FEE APPLICATION BY RHM  
 ) LAW LLP, GENERAL BANKRUPTCY  
 ) COUNSEL FOR THE DEBTOR, FOR  
 ) ALLOWANCE OF FEES AND  
 ) REIMBURSEMENT OF COSTS FOR  
 ) THE PERIOD JANUARY 3, 2024  
 ) THROUGH MAY 31, 2024**  
 )  
 )  
 ) Date: June 25, 2024  
 ) Time: 1:00 p.m.  
 ) Place: Courtroom 1545  
 ) 255 E. Temple Street  
 ) Los Angeles, CA 90012  
 )

**TO THE HONORABLE NEIL BASON, UNITED STATES BANKRUPTCY  
JUDGE; THE UNITED STATES TRUSTEE AND HIS COUNSEL OF RECORD;  
THE SUBCHAPTER V TRUSTEE; CREDITORS AND ALL PARTIES IN  
INTEREST:**

PLEASE TAKE NOTICE that on June 25, 2024 at 10:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 1545, 255 E. Temple Street, Los Angeles, CA

1 90012, RHM LAW LLP (“Applicant” or the “Firm”), general bankruptcy counsel for  
2 Orlando F. Cabanday, Jr., the “Debtor” and “Debtor-in-Possession”, will and does hereby,  
3 move the Court for an order approving this *First Interim Application for Allowance of Fees*  
4 and *Reimbursement of Costs* filed by RHM LAW LLP, general bankruptcy counsel for the  
5 Debtor (hereinafter the “Fee Application”).

6 The Fee Application is made pursuant to 11 U.S.C. §331, as follows:

| 7 <b>Professional</b> | 8 <b>Period</b>                   | 9 <b>Fees</b>  | 10 <b>Costs</b>      |
|-----------------------|-----------------------------------|--|----------------------|
| 11 <b>RHM LAW LLP</b> | 12 <b>1/3/2024-<br/>5/31/2024</b> | 13 <b>\$56,626 (less prepetition<br/>retainer remaining on the<br/>petition date of \$23,977.50)</b> | 14 <b>\$2,123.34</b> |

15 The Fee Application is based upon this Notice of Application, the separately filed  
16 Application and supporting declarations, all pleadings and records on file in this case, and  
17 upon such other evidentiary matters as may be presented to the Court regarding the Fee  
18 Application. If you desire a copy of the Fee Application, please advise counsel and copy  
19 will be provided to you by mail or electronic mail.

20 PLEASE TAKE FURTHER NOTICE that pursuant to *Local Bankruptcy Rule*  
21 *9013-1*, any party opposing the relief sought by the Fee Application must file a written  
22 opposition setting forth the facts and law upon which the opposition is based and must  
23 appear at the hearing on the Fee Application. Any factual allegations set forth in such  
24 written response must be supported by competent and admissible evidence. Any response  
25 or opposition to the Fee Application must be filed with the Court and served on the  
26 Applicant at least 14-days prior to the scheduled hearing date on the Fee Application (not  
27 excluding Saturdays, Sundays or legal holidays).

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1 Pursuant to *Local Bankruptcy Rule 9013-1*, any response not timely filed and served  
2 may be deemed by the Court to be consent to the granting of the relief requested by the Fee  
3 Application.

4 Dated: June 4, 2024

**RHM LAW LLP**

5 By: \_\_\_\_\_ /s/ **Roksana D. Moradi-Brovia**

6 **Roksana D. Moradi-Brovia**

7 **W. Sloan Youkstetter**

8 *Attorneys for Debtor*

Orlando F. Cabanday, Jr.

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
17609 Ventura Blvd., Suite 314  
Encino, CA 91316

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF HEARING ON FIRST INTERIM  
FEE APPLICATION BY RHM LAW LLP, GENERAL BANKRUPTCY COUNSEL FOR THE DEBTOR, FOR  
ALLOWANCE OF FEES AND REIMBURSEMENT OF COSTS

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 06/04/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 06/04/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 06/04/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Debtor via email

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

06/04/2024 Max Bonilla  
*Date* *Printed Name*

/s/Max Bonilla  
*Signature*

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) [CONTINUED]:**

- Counsel for Citibank: Chad L Butler caecf@tblaw.com
- Interested Party: Todd S. Garan ch11ecf@aldridgeppte.com, TSG@ecf.inforuptcy.com;tgaran@aldridgeppte.com
- Counsel for U.S. Trustee: Dare Law dare.law@usdoj.gov
- Counsel for Debtor: Roksana D. Moradi-Brovia Roksana@rhmfirrm.com, matt@rhmfirrm.com;rosario@rhmfirrm.com;sloan@rhmfirrm.com;priscilla@rhmfirrm.com;rebeca@rhmfirrm.com;david@rhmfirrm.com;susie@rhmfirrm.com;max@rhmfirrm.com;russ@rhmfirrm.com
- Counsel for Debtor: Matthew D. Resnik Matt@rhmfirrm.com, roksana@rhmfirrm.com;rosario@rhmfirrm.com;sloan@rhmfirrm.com;priscilla@rhmfirrm.com;rebeca@rhmfirrm.com;david@rhmfirrm.com;susie@rhmfirrm.com;max@rhmfirrm.com;russ@rhmfirrm.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- Subchapter V Trustee: Mark M Sharf (TR) mark@sharflaw.com
- Counsel for H. Grobstein: Roye Zur rzur@elkinskalt.com, TParizad@elkinskalt.com;lwageman@elkinskalt.com;1648609420@filings.docketbird.com

**2. SERVED BY UNITED STATES MAIL [CONTINUED]:**

*Secured Creditors (other than those served via NEF)*

Central Loan Admin & Reporting  
Attn: Bankruptcy  
194 Wood Ave South. Ninth Floor  
Iselin, NJ 08830

425 Phillips Blvd  
Ewing, NJ 08618

Cenlar FSB  
Attn BK Dept

Los Angeles County Tax Collector  
PO Box 54110  
Los Angeles, CA 90054-0110

All Other Creditors/Parties-in-Interest/Notice Only Parties

U. S. Securities and Exchange Commission  
Attn: Bankruptcy Counsel  
444 South Flower Street, Suite 900  
Los Angeles, CA 90071-9591

Franchise Tax Board  
Bankruptcy Section MS A340  
PO BOX 2952  
Sacramento, CA 95812-2952

Attorney General  
United States Department of Justice  
Ben Franklin Station  
P. O. Box 683  
Washington, DC 20044

California Department of Tax & Fee  
Special Procedures Section MIC: 29  
P.O. Box 942879  
Sacramento, CA 94279

Civil Process Clerk  
United States Attorney's Office  
Federal Building, Room 7516  
300 North Los Angeles Street  
Los Angeles, CA 90012

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Employment Development Department  
Bankruptcy Group MIC 92E  
P. O. Box 826880  
Sacramento, CA 94280-0001

Amex  
Correspondence/Bankruptcy  
Po Box 981540  
El Paso, TX 79998

Capital One  
Attn: Bankruptcy  
Po Box 30285

Salt Lake City, UT 84130

Capital One, N.A.  
c/o American InfoSource as Agent  
4515 N. Santa Fe Ave  
Oklahoma City, OK 73118

Chase Card Services  
Attn: Bankruptcy  
P.O. 15298  
Wilmington, DE 19850

JPMC c/o National Bankruptcy Services, LLC  
Bonial & Associates  
P.O. Box 9013  
Addison, TX 75001

Citibank  
Citicorp Cr Svcs/Centralized Bankruptcy  
Po Box 790040  
St Louis, MO 63179

Goldman Sachs Bank USA  
Attn: Bankruptcy  
Po Box 70379  
Philadelphia, PA 19176

Torrance Office Center  
21221 S. Western Avenue  
Torrance, CA 90501